

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CASE NO.: 2:18-CV-10316-DPH-EAS

TOM HUSSEY,

Plaintiff,

v.

GLENN R. MATECUN, P.C.,

Defendant.

UNOPPOSED MOTION FOR EXTENSION

Plaintiff TOM HUSSEY (“Hussey”), by and through its undersigned counsel, hereby moves for a one-week extension of time to file a Motion to Strike one or more of Defendant GLENN R. MATECUN, P.C.’s (“Matecun”) Affirmative Defenses [DE 06], up to and until April 11, 2018, and states as follows:

1. The Complaint was filed on February 7, 2018. [DE 01].
2. Matecun filed his Answer and Affirmative Defenses on March 14, 2018. [DE 06].
3. In the filing, Matecun raised twenty-nine (29) separate affirmative defenses, many of which Hussey believes are legally or factually insufficient. [*See* DE 06].
4. The current deadline for Hussey to file a motion to strike any of Matecun’s Affirmative Defenses is April 4, 2018.
5. The Parties have been discussing and continue to discuss a potential resolution of the matter regarding some or all of the affirmative defenses, and Hussey respectfully requests more time to engage in this discussion in order to limit the scope of any potential motion to strike Matecun’s affirmative defenses.

6. The Parties have also been actively and earnestly discussing the potential settlement of the entire matter, and Hussey respectfully asks for more time to continue to engage in such discussions and preserve the resources of the Parties and the Court.

7. A one-week extension, up to and until April 11, 2018, would allow for the parties to potentially resolve this entire matter, or at the very least limit the scope of potential objections, and result in a more just, speedy, and inexpensive determination of this proceeding.

8. Counsel for Hussey has conferred with counsel for Matecun and counsel for Matecun has stated that it does not oppose this Motion.

9. Neither Party would be prejudiced by the relief sought in this Motion.

WHEREFORE, Plaintiff Tom Hussey, respectfully asks this Court for a one-week extension to move to strike one of more of Defendant's Affirmative Defenses [DE 06], up to and until April 11, 2018.

Dated: April 4, 2018

Respectfully submitted,

/s/ Jerold I. Schneider

JEROLD I. SCHNEIDER

Michigan Bar Number: P20029

Jerold.schneider@sriplaw.com

**SCHNEIDER ROTHMAN INTELLECTUAL PROPERTY
LAW GROUP, PLLC**

4651 North Federal Highway

Boca Raton, FL 33431

561.404.4350 – Telephone

561.404.4353 – Facsimile

Counsel for Plaintiff Tom Hussey

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on April 4, 2018, a true and correct copy of the foregoing document was served by electronic mail by the Court's CM/ECF System to all parties listed below on the Service List.

/s/ Jerold I. Schneider

JEROLD I. SCHNEIDER

SERVICE LIST

Mr. Anthony A. Randazzo
Secrest Wardle
2600 Troy Center Drive
P.O. Box 5025
Troy, MI 48007-5025
arandazzo@secrestwardle.com
Attorney for Glenn R. Matecun, P.C.